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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEXANDRA RASEY-SMITH;
GORDON GENE MACCANI; and
JANET MACCANI,

Plaintiffs,

V.

CITY OF LOS ANGELES; CALEB GARCIA ALAMILLA; and DOES 2-10, inclusive

Defendants.

Case No. 2:24-cv-03265-MWC-SSC

**DEFENDANTS' NOTICE OF
MOTION AND MOTION FOR
LEAVE TO LODGE VIDEO
EXHIBITS UNDER SEAL IN
SUPPORT OF THEIR MOTION
FOR PARTIAL SUMMARY
JUDGMENT**

*Filed concurrently with Declaration of
Susan E. Coleman; and [Proposed]
Order*

Judge: Hon. Michelle Williams Court
Date: December 26, 2025
Time: 1:30 p.m.
Crtrm: 6A

Trial Date: April 6, 2026

TO THE HONORABLE COURT, ALL PARTIES, AND TO THEIR
ATTORNEYS OF RECORD:

1 PLEASE TAKE NOTICE that Defendants City of Los Angeles and Caleb
2 Garcia Alamilla (“Defendants”) will and hereby do move the Court, pursuant to
3 Local Rule 79-5, for leave to lodge under seal the three video exhibits submitted as
4 exhibits of Caleb Garcia Alamilla and Colin Chomuk, which are being filed
5 concurrently with Defendants’ Motion for Partial Summary Judgment. Good cause
6 exists to lodge these three video exhibits under seal because the surveillance and
7 body worn camera footage contains sensitive information that is subject to the
8 Court’s Protective Order in this matter (ECF No. 36). They were produced as
9 confidential and subject to the protective order.

10 **I. MATERIALS REQUESTED TO BE SEALED**

11 Defendants seek to lodge under seal the following items (collectively, the
12 “Video Exhibits”):

13 1. **Exhibit A** to the Declaration of Defendant Caleb Garcia Alamilla:
14 surveillance video footage (DEF2520) depicting the events that occurred in the
15 fourth floor hallway on February 3, 2024.

16 2. **Exhibit B** to the Declaration of Defendant Caleb Garcia Alamilla:
17 footage from Defendant Garcia’s body worn camera (DEF2521) depicting the
18 events that occurred in the fourth floor hallway on February 3, 2024.

19 3. **Exhibit A** to the Declaration of Officer Colin Chomuk: footage from
20 Officer Chomuk’s body worn camera (DEF2504) depicting the events that occurred
21 in the fourth floor hallway on February 3, 2024.

22 These materials will be manually lodged under seal pursuant to Local Rule 5-
23 4.2 because they consist of video files not conducive to electronic filing through
24 CM/ECF. A Notice of Manual Lodging (Form G-92) will accompany the lodged
25 Video Exhibits.

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1 **II. GROUNDS FOR SEALING**

2 It is true that there is a strong presumption in favor of public access to judicial
3 records and against sealing. *See Kamakana v. Cty. & Cnty. of Honolulu*, 447 F.3d
4 1172, 1180 (9th Cir. 2006); *Nixon v. Warner Comm., Inc.*, 435 U.S. 589, 597
5 (1978); *Globe Phillips ex rel. Estates of Byrd v. General Motors Corp.*, 307 F.3d
6 1206, 1212 (9th Cir. 2002). As such, if a court decides to seal judicial documents
7 and records in a case, it must identify the compelling interest and articulate the
8 factual basis for its finding “without relying on hypothesis or conjecture.”
9 *Kamakana*, 447 F.3d at 1179.

10 Good cause exists to seal the Video Exhibits because they contain: (1)
11 sensitive depictions of the decedent at the scene, including him being shot and
12 medical response efforts; and (2) law-enforcement tactics and operational details
13 that are not suitable for public disclosure. The Video Exhibits were produced in
14 discovery in this matter pursuant to the Court’s Protective Order (ECF No. 36),
15 which prohibits public disclosure of confidential materials and expressly provides
16 that any violation of the order may be punished by any and all appropriate measures,
17 including contempt proceedings and/or monetary sanctions. Disclosure of these
18 videos on the public docket would compromise privacy interests, risk misuse of
19 sensitive content, and subject Defendants to contempt for violating the Protective
20 Order. Sealing is therefore narrowly tailored to protect those interests while still
21 preserving public access to written materials (Defendants’ Motion for Partial
22 Summary Judgment) that summarize the evidence.

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1 **III. CONCLUSION**

2 For the foregoing reasons, Defendants respectfully request that the Court
3 grant leave to lodge the Video Exhibits under seal and direct the Clerk to maintain
4 the lodged videos under seal unless otherwise ordered by the Court.

5 Dated: November 7, 2025

BURKE, WILLIAMS & SORENSEN, LLP

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8 By: Susan E. Coleman

9 Susan E. Coleman
10 Attorneys for Defendant
11 CALEB GARCIA ALAMILLA

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Dated: November 7, 2025

LOS ANGELES CITY ATTORNEY

By: Ty A. Ford

Ty A. Ford
Attorneys for Defendant CITY OF
LOS ANGELES

ELECTRONIC SIGNATURE CERTIFICATION

I, Susan E. Coleman, hereby attest that all other signatories listed, and on
whose behalf the filing is submitted, concur in the filing's content and have
authorized the electronic filing.

Dated: November 7, 2025

BURKE, WILLIAMS & SORENSEN, LLP

By: /s/ Susan E. Coleman

Susan E. Coleman
Lauren S. Dossey
Attorneys for Defendant
CALEB GARCIA ALAMILLA